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JUL 29 2022 *js*

1 Denise McCloud

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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6 UNITED STATES DISTRICT COURT

7 NORTHERN DISTRICT OF CALIFORNIA

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DENISE MCLOUD, et al. Plaintiffs, v. COUNTY OF SONOMA et al., Defendants.	Case No. 22-cv-04284-HSG REPLY TO COUNTY'S OPPOSITION TO PLAINTIFFS' TRO
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18 Plaintiffs continue to require the Court's protection due to the inadequacy of the

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20 placements as discussed below.

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22 **Placements discriminate against unhoused people**

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25 In the past, the County has not rehoused us at another hotel if hotels decide they do not

26 want to rent rooms to the County to house us there. In one instance an unhoused person

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1 believed they had a room rented for them, but when they returned, they were told by the
2 hotel that no homeless were welcomed there. The county did not find alternative housing
3 options for the individuals that were forced to leave the hotel.
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6 On Wednesday the County had to find another hotel for those Joe Rodota residents
7 placed at the Extended stay hotel in Santa Rosa because the hotel decided they did not
8 want to rent rooms to the County for the unhoused. The county could not find anything
9 in town and had to go out of town. The out-of-town placements do not offer meals and
10 leave those placed in the hotels out of town with no options for food services that they
11 would otherwise have in Santa Rosa.
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15 Hotels may decide to not allow for unhoused residents, as has already happened at one
16 hotel this time and at other times in the past. If the hotels do not want us, we may be back
17 on the Joe Rodota Trail before 30 days are complete.
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Background Checks Incomplete

1 Plaintiffs have also not been told whether they and other unhoused residents have passed
2 the County's background checks. If background checks come back and we are not
3 qualified to stay, we may lose our placement and end up without a shelter option.
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6 **30-day Placements Are Inadequate**

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9 With the exception of Tim Rucker, all of the placements offered by the County are only
10 going to be for 30 days. Other placements the county offers are either for 6 months (Sam
11 Jones shelter) or until the unhoused person finds permanent supportive housing. After 30
12 days, we may end up back on Joe Rodota Trail.
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15 We would like the Court to further protect us by not dissolving the TRO until it is proven
16 that serious steps have been taken to enable us to remain housed for a minimum of 6
17 months such as that offered at the Sam Jones congregate shelter.
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20 We also request an order confirming that if anyone doesn't pass background checks at the
21 trailers that the County be ordered to move them to another non-congregate placement.
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1 Based on prior experiences such as some of those mentioned here and in our other
2 documents, we do not trust that the county will provide adequate placements without the
3 Court's protection.
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6 Prior to the filing of the TRO, the County was not offering the trailers and motel rooms.
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8 On Monday, July 25th, after County counsel was informed that we would file the case
9 and had received the TRO, the County began offering trailers and motel rooms. I was not
10 offered a placement before Monday, July 25th.

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12 Just two weeks ago at the Board of Supervisors meeting, the County said they weren't
13 going to open up the trailers. It was also reported that the trailers were too expensive and
14 they were going to give the trailers away to other organizations. It was also reported that
15 no shelter beds were available at the congregate shelter.
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19 Date: July 28th, 2022

20 _____
21 /s/ _____

22 Denise McCloud